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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

JUL 5 1996

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

In the Matter of )  
 )  
Amendment of Section 73.202(b), ) MM Docket No. 96-12  
Table of Allotments, ) RM-8741  
FM Broadcast Stations )  
(The Dalles and Corvallis, )  
Oregon 1/) )

and )

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Amendment of Section 73.202(b), ) MM Docket No. 96-7  
Table of Allotments, ) RM-8732  
FM Broadcast Stations )  
(Banks, Redmond and Corvallis, )  
Oregon 1/) )

TO: Chief, Allocations Branch  
Policy and Rules Division  
Mass Media Bureau

REPLY COMMENTS OF LIFETALK BROADCASTING ASSOCIATION

LifeTalk Broadcasting Association ("LifeTalk"), by counsel and pursuant to Section 415(d) of the Commission's rules, hereby responds to the Commission's Public Notice of June 5, 1996, Petitions for Rulemaking Filed, Report No. 2135. In that Public Notice, the Commission announced that it would consider as a counterproposal in both MM Dockets 96-12 and 96-7, a one-step upgrade application filed by Madgekal Broadcasting, Inc. for KFLY, Corvallis, Oregon.

LifeTalk originally filed the Petition for Rulemaking to allot Channel \*268C3 to The Dalles, Oregon as a reserved noncommercial channel. This resulted in the Commission's initiating a rulemaking proceeding in Docket 96-12. LifeTalk

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1/ The community of Corvallis, Oregon has been added to the caption of both proceedings.

filed Comments in that proceeding reiterating its support for the proposal and its commitment to apply for and to construct a new station on the proposed channel.

Madgekal's proposal to upgrade the Corvallis allotment to Channel 268C is mutually exclusive with LifeTalk's proposal for Channel 268C3 at The Dalles. Madgekal's proposal is also mutually exclusive with the proposals in Docket 96-7 to realign certain channels at Banks and Redmond, Oregon, the net result of which would be to upgrade the Banks allotment from a Class C2 to a Class C1.

The proponents of the Banks and Redmond allotment changes in Docket 96-7, Common Ground Broadcasting, Inc. and Combined Communications, Inc., have submitted "Consolidated Joint Counterproposal Reply Comments" dated July 3, 1996. In that pleading, they set forth a global solution that would accommodate new or improved allotments for all of the communities involved in these two proceedings. The Banks allotment could be upgraded from C1 to C2, a new allotment could be added at The Dalles for a noncommercial service (with a change in the coordinates from those originally proposed), and the Corvallis allotment could be upgraded from a C2 to a C1 (instead of the C proposed by Madgekal). As demonstrated in the Joint Reply Comments, the area and population which could receive new service from this combination of facilities far exceeds those for any other combination of proposals in these two proceedings.

LifeTalk supports the global solution presented by Common Ground and Combined Communications. LifeTalk does not

object to the relocation of the reference coordinates for the proposed allotment at The Dalles. LifeTalk renews its commitment to file an application for Channel \*268C3 if allotted to The Dalles, whether or not the reference coordinates are changed to accommodate Madgekal's application.

Adoption of the global solution would be in the public interest for all of the reasons presented in the Consolidated Joint Counterproposal Reply Comments. LifeTalk urges the Commission to adopt the global solution.

Respectfully submitted,

LIFETALK BROADCASTING ASSOCIATION

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July 5, 1996

**CERTIFICATE OF SERVICE**

I, Donald E. Martin, hereby certify this 5th day of July, 1996, that I have caused a copy of the foregoing document to be served by United States mail with first class postage prepaid upon the following:

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